### IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

UNITED STATES OF AMERICA §
vs. § CAUSE NO. A-15-CR-073 LY
JOSE ALVARADO SALINAS §

#### MOTION FOR PERMISSION TO TRAVEL

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW JOSE ALVARADO SALINAS, Defendant, by and through his attorney of record, and files this Motion for Travel and would show the Court as follows:

I.

Defendant was notified on June 15, 2015, during an office consultation with his attorney of record, that Antonio Perez Garcia, his father in law, had just passed away from lung disease related complications. Defendant requests permission to travel with his family from the Austin, Texas to San Luis de la Paz, Guanajuato, Mexico from June 16, 2015, to June 17, 2015 to attend the funeral of his father-in law (travel time from Austin, Texas to San Luis de la Paz is approximately 12 hours; Defendant has also filed a separate motion to continue his sentencing date). Defendant has been in full compliance with his conditions of release since his bond hearing

II.

US Pretrial Services Officer Stacy Salinas has been advised of this motion and has no objection. Assistant United States Attorney Michael Galdo has been advised of this motion and has no objection.

WHEREFORE, PREMISES CONSIDERED, Defendant moves this Court for an order modifying his conditions of release to allow him to travel from the Austin, Texas to San Luis de la Paz, Guanajuato, Mexico from June 16, 2015, to June 17, 2015.

# Respectfully submitted,

/s/ Guillermo González

Guillermo González State Bar No. 08126700 904 West Avenue, Suite 100 Austin, Texas 78701 (512) 474-8001 Telephone (512) 474-8006 Facsimile Attorney for Defendant

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	ORDI	ER
On this day came to be considered same, this Court is of the opinion that said		lant's Motion for Travel. After consideration of a is
GRANTED.		
DENIED.		
Signed on this the day of	of	, 2015.
UNITED S	TATES	S DISTRICT JUDGE

## **CERTIFICATE OF SERVICE**

I hereby certify that on June 15, 2015, a true and correct copy of the foregoing instrument was electronically filed with the Clerk of the Court, using the CM/ECF system which will transmit notification of such filing to the following attorney of record:

Michael Galdo, AUSA 816 Congress Ave., Suite 1000 Austin, Texas 78701

> /s/ Guillermo González Attorney for Defendant